



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, NY 10007

June 20, 2023

BY ECF

The Honorable Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Application Granted

A handwritten signature of Valerie Figueredo in black ink, written over a horizontal line.

Valerie Figueredo, U.S.M.J.

DATED: June 21, 2023

The Clerk of Court is directed to
terminate the motion at ECF No. 43.

Re: *Safe Horizon, Inc., et al. v. United States Citizenship and Immigration Services, et al.*,
1:21-cv-02328-LAK-VF

Dear Judge Figueredo:

Defendant United States Citizenship and Immigration Services (“USCIS”) and the United States Department of Homeland Security (“DHS”) (together the Government”) and Plaintiff Safe Horizon, Inc. and Asista Immigration Assistance (together with the Government, the “Parties”) respectfully request a one-week extension to file their joint status report in the above-referenced Freedom of Information Act (“FOIA”), which is currently due today, ECF No. 42.

The parties are in continued discussions about a path forward in this FOIA litigation and need additional time to complete those discussions. Accordingly, the Parties respectfully request a one-week extension, until June 27, to file their joint status report.

We thank the Court for its consideration.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Dominika Tarczynska
DOMINIKA TARCZYNSKA
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, NY 10007
Tel: (212) 637-2748
Fax: (212) 637-2686
dominika.tarczynska@usdoj.gov

cc: Akiva Shapiro (via ECF)
Attorneys for Plaintiffs